

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454
)	
1) CASTLE HILL STUDIOS LLC)	
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

**VIDEO GAMING TECHNOLOGIES, INC.’S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS TO CASTLE HILL GAMING**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiff Video Gaming Technologies, Inc. serves the following requests for the production of documents and things on Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC. VGT requests that Defendants provide responses to each request and produce the documents and things sought for inspection and copying at the office of VGT’s counsel, Covington & Burling LLP, One CityCenter, 850 Tenth Street, NW, Washington, DC, 20001 or at a place mutually agreeable to the parties, within the time prescribed by the Federal Rules of Civil Procedure and the Local Rules of this Court.

DEFINITIONS

Unless the terms of a request specifically indicate otherwise, the following definitions are applicable throughout these requests and are incorporated into each request.

1. “Accused Games” refers to any CHG game alleged in the Complaint to infringe VGT’s intellectual property rights, including the following: Welcome to Nugget Mountain; New Money; Arctic Cash; Arctic Ice; Dublin Your Luck; Double Hotness; Genie’s Gems; Mr. Martini; Vegas Baby; Mr. Martini; Coin Slinger; Aces & Hogs; Amazing Ca\$h; 10,000 Diamonds; 20,000 Diamonds; Captain Bacon; and Pink Sapphires.

2. “AWARD SOUND Trade Dress Feature” refers to VGT’s use of specific sounds, including the sound of a mechanical bell, as an indicator that the player has won credits.

3. “BINGO PLAY AND PAYS Trade Dress Feature” refers to the winning bingo patterns VGT uses with its 3-Reel Mechanical Games, the method for conducting the ball drop VGT uses with its 3-Reel Mechanical Games, and the pay tables VGT uses to display to players the credits that will be awarded for each winning combination on the reels of the 3-Reel Mechanical Games.

4. “Castle Hill Gaming,” “CHG,” “You,” “Your,” and “Yours” mean Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC; their parents, successors, predecessors, subsidiaries, affiliates and assignees thereof; their present and former officers, directors, agents, representatives, consultants, employees, and attorneys; and any other Persons subject to the direction and control of, or acting on behalf of, any of the foregoing, both past and present.

5. “Communication” and Communications” refers to the transmittal of information, in the form of facts, ideas, inquiries, or otherwise, including any electronic written and/or oral transmission of any thought, idea, information or belief whether recorded or not recorded in any document.

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The parties should include a link to these files in the Concordance data file (.dat file), as well as the original file name and any relevant custodian information. The parties will include a placeholder image in the production for these documents that will contain the production ID and the original file name. Native file format documents will be produced on CD or DVD disks or on portable hard drives, as appropriate due to volume.

12. These requests are continuing in character, so as to require You to produce any further Documents and Things called for in accordance with Federal Rule of Civil Procedure 26(e).

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All Documents and Things referring or relating to regulatory or compliance submissions by CHG concerning each Accused Game, including submissions to any regulatory body, tribe or third-party testing organization involved in reviewing or approving the Accused Games.

REQUEST FOR PRODUCTION NO. 2:

All Documents and Things Former VGT employees brought to CHG from VGT.

REQUEST FOR PRODUCTION NO. 3:

All Documents and Things that (a) were created by or at VGT or (b) are the property of VGT.

REQUEST FOR PRODUCTION NO. 4:

All Documents and Things concerning VGT.

REQUEST FOR PRODUCTION NO. 5:

All Documents and Things concerning the design or development of the Accused Games or other Class II games.

REQUEST FOR PRODUCTION NO. 6:

All versions of source code ever deployed on or tested with the Accused Games, their related servers (including servers used in connection with the bingo call for any of the Accused Games), or other Class II gaming development work.

REQUEST FOR PRODUCTION NO. 7:

All Documents and Things referring or relating to the math, probability, statistics, payouts, return to player, or other mathematical calculations used in connection with the Accused Games, including PAR sheets and other similar documents.

REQUEST FOR PRODUCTION NO. 8:

All Documents and Things referring or relating to the random number generator or seeding technique used in the Accused Games.

REQUEST FOR PRODUCTION NO. 9:

All Documents and Things relating to CHG's practices or policies regarding Marks, Trade Dress, or Trade Secrets.

REQUEST FOR PRODUCTION NO. 10:

All Communications between CHG and Former VGT Employees prior to their employment by CHG.

REQUEST FOR PRODUCTION NO. 11:

All Documents and Things relating to employment agreements between CHG and each Former VGT Employee.